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6 *Attorney for Plaintiff*

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 GATEWAY INSURANCE COMPANY, a  
11 Missouri corporation,

12 Plaintiff,

13 vs.

14 ALEXANDER FERNANDEZ-LEON, an  
individual; YENDRY HERNANDEZ-  
ECHEVARRIA, an individual; GRETSIN  
CONSUEGRA SORIANO, an individual;  
JUAN SCHUEG-CASTRO, an individual;  
JOSE PRIETO-HERNANDEZ, an individual;  
15 NELLIS CAB LLC, OPERATION SERIES  
NELLIS CAB LLC, VEH. SERIES 102, a  
Nevada series limited liability company,  
16  
17  
18

19 Defendants.

Case No.: 2:19-cv-00771-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND DEADLINES FOR REPLY  
IN SUPPORT OF MOTION FOR  
STAY AND FOR OPPOSITION TO  
MOTION TO DISMISS**

**(First Request)**

20 Plaintiff Gateway Insurance Company (“Plaintiff”) by and through its counsel of record,  
21 Scott A. Flinders and Todd W. Prall of the law firm Hutchison & Steffen, PLLC, and  
22 Defendants Yendry Hernandez-Echevarria, Gretsin Consuegra Soriano, Juan Schueg-Castro,  
23 and Jose Prieto-Hernandez (“Defendants”), by and through their counsel, Joseph A. Gutierrez  
24 and Stephen G. Clough of Maier Gutierrez and Associates, and hereby stipulate and agree to  
25 extend the time to file a reply in support of Plaintiff Gateway Insurance Company’s Notice  
26 and/or Motion for Stay Due to Gateway Insurance Company’s Liquidation (“Motion for Stay”)  
27 (Doc. #56), which Defendants opposed (Doc. #57), and an opposition to Defendants’  
28 Countermotion to Dismiss for Want of Prosecution (“Countermotion”) (Doc. #58) to August

1       13, 2020. Plaintiff requested this extension because it has not yet obtained necessary direction  
2 concerning how to manage this lawsuit from the receiver, and Plaintiff needs additional time to  
3 ensure that the receiver for Plaintiff can provide counsel with direction on how to proceed with  
4 the lawsuit.

5                  Pursuant to Local Rule 6-1(B), the parties hereby aver that this is the first such  
6 discovery extension requested in this matter and is not sought for the purposes of delay.

7                  Plaintiff and Defendants, therefore stipulate as follows:

8                  1.       That Plaintiff shall have until August 13, 2020 to file a reply in support of the its  
9 Motion for Stay (Doc. #56).

10                 2.       That Plaintiff shall have until August 13, 2020 to file an opposition to the  
11 Countermotion (Doc. #58).

12                  DATED this 30<sup>th</sup> day of July, 2020.

13                  HUTCHISON & STEFFEN, PLLC

15                  /s/ Todd W. Prall  
16                  Scott A. Flinders (6975)  
17                  Todd W. Prall (9154)  
18                  HUTCHISON & STEFFEN, PLLC  
19                  Peccole Professional Park  
20                  10080 West Alta Drive, Suite 200  
21                  Las Vegas, Nevada 89145

22                  *Attorneys for Plaintiff*

12                  DATED this 30<sup>th</sup> day of July, 2020.

13                  MAIER GUTIERREZ & ASSOCIATES

15                  /s/ Stephen G. Clough  
16                  Joseph A. Gutierrez (9046)  
17                  Stephen G. Clough (10549)  
18                  8816 Spanish Ridge Avenue  
19                  Las Vegas, Nevada 89148

20                  *Attorneys for Defendants Yendry  
21 Hernandez-Echeverria, Gretsin  
22 Consuegra Soriano, Juan Schueg-Castro,  
23 and Jose Preito-Hernandez*

24                  IT IS SO ORDERED

25                    
26                  United States District Judge

27                  Dated: 7/30/2020